

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHRISTIE BOWERS,)	Case No.: C08-1768RSM
)	
Plaintiff,)	DECLARATION OF DEFENDANTS IN
)	SUPPORT OF DEFENDANT'S MOTION TO
vs.)	COMPEL, SHOW CAUSE, AND FOR
)	SANCTIONS
ROBIN KLETKE and ROBIN COHEN,)	
husband and wife and the marital community)	
composed thereof,)	NOTE ON MOTION DOCKET:
<i>Pro Se</i> Defendants)	FEBRUARY 11, 2011

Pro Se Defendants, Robin Kletke and Robin Cohen declare as follows:

1. We are the defendants in the above referenced case and are filing this declaration pro se.
2. Attached hereto as Exhibit A is a true and correct copy of an email sent to Mr. Gregory P. Cavagnaro on December 23, 2010.
3. Attached hereto as Exhibit B is a true and correct copy of a letter received from Mr. Gregory P. Cavagnaro on January 6th, 2011.

1 Defendants declare under penalty of perjury that the foregoing is true and correct.

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3 Dated this 25th Day of January, 2011 at Woodinville, WA

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6 Robin Cohen

Robin Kletke

7 16820 226th Ave NE
8 Woodinville, WA 98077
9 206-718-1237
10 robinkletke@hotmail.com
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CERTIFICATE OF SERVICE

We, Robin Kletke and Robin Cohen, hereby certify that on January 25th, 2011, we filed with the Clerk of the Court via CM/ECF the foregoing DECLARATION OF DEFENDANTS IN SUPPORT OF DEFENDANT'S MOTION TO COMPEL, SHOW CAUSE, AND FOR SANCTIONS. Said CM/ECF filing will send notifications of this filing to the following:

Mark Walters
1411 Fourth Avenue, Suite 75
Seattle, WA 98101
mark@walterslawfirm.com
Attorney for Plaintiff, Attorney to be Noticed

Duncan Calvert Turner
Badgley Mullins Law Group
701 Fifth Ave, Ste 4750
Seattle, WA 98104
duncanturner@badgleymullins.com
Attorney for Plaintiff, Attorney to be Noticed

Mr. Cavagnaro was terminated from the case on September 22, 2010 so it unclear if he will be automatically notified via CM/ECF. Therefore, we, Robin Kletke and Robin Cohen, hereby certify that on January 25th, 2011, we served the foregoing DECLARATION OF DEFENDANTS IN SUPPORT OF DEFENDANT'S MOTION TO COMPEL, SHOW CAUSE, AND FOR SANCTIONS on Mr. Gregory P. Cavagnaro via facsimile, email, and first class mail to the following last known contact address:

Gregory P. Cavagnaro
2100 – 116th Ave NE
Bellevue, WA 98004
Former Attorney for Plaintiff

Fax: (425) 451-1689
greg@gcavlaw.com

1 We certify under penalty of perjury, under the laws of the State of Washington, that the
2 foregoing is true and correct.

3 Dated this 25th Day of January, 2011 at Woodinville, WA

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7 _____
8 Robin Cohen Robin Kletke
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EXHIBIT A

r2agility@frontier.com

From: "Robin Kletke" <robinkletke@hotmail.com>
To: <greg@gcavlaw.com>
Cc: <bk@gcavlaw.com>; <r2agility@frontier.com>
Sent: Thursday, December 23, 2010 10:10 AM
Subject: Bowers v. Kletke - C08-1768 RSM - Court Order on Motion for Monetary Sanctions
Mr. Cavagnaro,

The court ordered (DKT #118) payment of \$8000.00 is now due.

Please send the payment to:

Robin Kletke & Robin Cohen
16820 226th Ave NE
Woodinville, WA 98077

Thank you for your attention to this court order.

Sincerely,

Robin Kletke & Robin Cohen

EXHIBIT B

GREGORY P. CAVAGNARO
ATTORNEY AT LAW

Gregory P. Cavagnaro
2100 - 116th Avenue NE
Bellevue, WA 98004

greg@gcavlaw.com
Telephone (425) 451-1400

January 5, 2011

Mr. Robin Kletke
16820 226th Ave. NE
Woodinville, WA 98077

Re: Bowers v. Kletke et al. U.S. Court of Appeals, Ninth Circuit
Case No. 10-36030

Dear Mr. Kletke:

I am in receipt of a recent email from you concerning the payment of sanctions pursuant to the order of Judge Martinez. Please be advised that I will not accept emails from you and all future emails from you will be blocked. Under the circumstances, I must insist that written communication be by letter or by facsimile.

Based on my understanding of Ms. Bower's appeal and your cross appeal, issues surrounding the sanctions are in dispute and are subject to the final decision pursuant to the appeal and cross appeal referenced above.

I am prepared to tender the funds once a final decision is made in the Court of Appeals case.

Sincerely,



Gregory P. Cavagnaro